## Federal Defenders OF NEWYORK, INC.

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David E. Patton

Executive Director

and Attorney-in-Chief

Southern District of New York

Jennifer L. Brown

Attorney-in-Charge

September 14, 2023

The Hon. Judith McCarthy United States Magistrate Judge United States Courthouse 300 Quarropas St. White Plains, NY 10601

Re: United States v. Jeff Tognetti, Case No. 23-cr-453 (NSR)

Dear Judge McCarthy,

I am writing to request that the Court modify the terms of Mr. Tognetti's release to permit him an extra week to fulfill his bond conditions. The government has no objection.

On August 31, 2023, the Court, the Honorable Andrew Krause presiding, released Mr. Tognetti on an agreed-upon bail package that included an unsecured \$100,000 bond signed by two financially responsible people (FRP) by today, September 14, 2023.

Mr. Tognetti is still working to fulfill bond conditions. One potential FRP has already been interviewed, but has yet to be approved. As such, he requests an additional week (until September 21, 2023) to fulfill his bond conditions. As noted, the government has no objection.

Thank you for your consideration of this request.

Sincerely,

Rachel Martin

Ran Janto

Assistant Federal Defender

cc: AUSA Jennifer Ong

U.S. Pretrial Services Officer Andrew Abbott

**APPLICATION GRANTED** 

<u>Verous ( M % )</u>
Hon. Judith C. McCarthy 9-14-2023